

THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ROB RINDE f/k/a ROBERT LARRY LEROY
PITSOR, JR.,

Plaintiff,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole, aka the "MORMON CHURCH" THE
CHURCH OF JESUS CHRIST OF LATTER-
DAY SAINTS, an unincorporated association,

Defendant.

NO. C06-0556 TSZ

DECLARATION OF PAUL D.
RYTTING IN OPPOSITION TO
PLAINTIFF'S MOTION TO
AMEND AND TO REMAND

I, Paul D. Rytting, declare as follows:

1. My name is Paul D. Rytting. I am over the age of eighteen and I make these statements based upon personal knowledge.
2. I have been a member of the Church of Jesus Christ of Latter-Day Saints ("the Church") all of my life. I currently function as the Risk Manager for the Corporation of the President of the Church of Jesus Christ of Latter-Day Saints ("COP") and am familiar with the

DECLARATION OF PAUL D. RYTTING IN OPPOSITION TO
PLAINTIFF'S MOTION TO AMEND AND TO REMAND - 1
No. C06-0556 TSZ

GORDON MURRAY TILDEN LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154
Phone (206) 467-6477
Fax (206) 467-6292

1 legal organization of COP and the Church. I have worked in similar or related positions for
2
3 fifteen years.
4

5 3. For over 75 years, COP has been incorporated as a corporation sole under Utah
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7 law. COP has its headquarters in Salt Lake City, Utah. It hires and pays employees, holds
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9 significant assets and carries out church business.
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11 4. The Church, in contrast, exists solely as an ecclesiastical organization. In its
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13 unincorporated form, the Church holds no assets or property. It does no business in any state,
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15 nor is it registered to do so. The Church has no employees, and has no money from which to pay
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17 salaries. The Church has no asserts or property from which a judgment can be satisfied.
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19 5. The Church has more than 27,000 congregations. There are 12.6 million
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21 members worldwide, with 245,665 in the State of Washington as of December 31, 2005.
22

23 6. The Church has no corporate identity and no articles of association, bylaws, or
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25 rules governing its legal existence. Instead, the Church is organized and governed by scripture,
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27 by modern revelation, and by ecclesiastical doctrines and beliefs of its members.
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29 7. Under Church doctrine, the Church functions as the Kingdom of God on earth.
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31 From time to time, the president or other "general authorities" of the Church provides spiritual
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33 and doctrinal guidance to local Church leaders and to the general membership. Local Church
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35 leaders also perform functions similar to those performed by other religious organizations,
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37 including blessings, baptisms, confirmations, ordinations, and the calling of members to serve in
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39 volunteer
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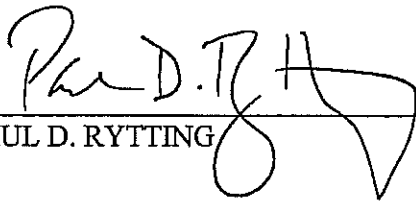
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43 ///

1 ecclesiastical positions.
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3 I declare under penalty of perjury that the foregoing is true and correct.
4

5 SIGNED at Salt Lake City, Utah, this 22nd day of May, 2006.
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11 PAUL D. RYTTING
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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Michael T. Pfau
Michelle A. Menely
Gordon, Thomas, Honeywell, Malanca, Peterson & Daheim LLP
600 University, Suite 2100
Seattle, WA 98101-4185
E-mail: mpfau@gth-law.com
E-mail: mmenely@gth-law.com
Co-Counsel for Plaintiff Rob Rinde

Timothy D. Kosnoff
Law Offices of Timothy D. Kosnoff
800 Bellevue Way N.E., #300
Bellevue, WA 98004
E-mail: timkosnoff@comcast.net
Co-Counsel for Plaintiff Rob Rinde

s/Jeffrey I. Tilden
Jeffrey I. Tilden, WSBA #12219
Gordon Murray Tilden LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154
Telephone: 206-467-6477
Facsimile: 206-467-6292
E-mail: jtilden@gmtlaw.com